

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

In re VALEANT PHARMACEUTICALS INTERNATIONAL, INC. SECURITIES LITIGATION)	No. 3:15-cv-07658-MAS-LHG
)	
)	
<hr/> T. ROWE PRICE GROWTH STOCK FUND, INC., et al.,)	No. 3:16-cv-05034-MAS-LHG
)	
Plaintiffs,)	
)	
vs.)	
)	
VALEANT PHARMACEUTICALS INTERNATIONAL, INC., et al.,)	
)	
Defendants.)	
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STIPULATION AND

ORDER REGARDING PARTIAL STAY

EQUITY TRUSTEES LIMITED AS) No. 3:16-cv-06127-MAS-LHG
RESPONSIBLE ENTITY FOR T. ROWE)
PRICE GLOBAL EQUITY FUND, et al.,)

Plaintiffs,)

vs.)

VALEANT PHARMACEUTICALS)
INTERNATIONAL, INC., et al.,)

Defendants.)

PRINCIPAL FUNDS, INC. and) No. 3:16-cv-06128-MAS-LHG
PRINCIPAL VARIABLE CONTRACTS)
FUNDS, INC.,)

Plaintiffs,)

vs.)

VALEANT PHARMACEUTICALS)
INTERNATIONAL, INC., et al.,)

Defendants.)

BLOOMBERGSEN PARTNERS FUND) No. 3:16-cv-07212-MAS-LHG
LP and BLOOMBERGSEN MASTER)
FUND LP,)

Plaintiffs,)

vs.)

VALEANT PHARMACEUTICALS)
INTERNATIONAL, INC., et al.,)

Defendants.)

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PENTWATER EQUITY
OPPORTUNITIES MASTER FUND
LTD., et al.,

Plaintiffs,

vs.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Defendants.

DISCOVERY GLOBAL CITIZENS
MASTER FUND, LTD., et al.,

Plaintiffs,

vs.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Defendants.

MSD TORCHLIGHT PARTNERS, L.P.,
et al.,

Plaintiffs,

vs.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Defendants.

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) No. 3:17-cv-07552-MAS-LHG

) No. 3:16-cv-07321-MAS-LHG

) No. 3:16-cv-07324-MAS-LHG

BLUE MOUNTAIN FOINAVEN
MASTER FUND, L.P., et al.,

Plaintiffs,

VS.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Defendants.

INCLINE GLOBAL MASTER LP, INC.,
et al.

Plaintiffs,

VS.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Defendants.

VALIC COMPANY I, et al.,

Plaintiffs,

VS.

VALEANT PHARMACEUTICALS
INTERNATIONAL, INC., et al.,

Defendants.

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JANUS ASPEN SERIES, et al.,)	No. 3:16-cv-07497-MAS-LHG
Plaintiffs,)	
vs.)	
VALEANT PHARMACEUTICALS)	
INTERNATIONAL, INC., et al.,)	
Defendants.)	
OKUMUS OPPORTUNISTIC VALUE)	No. 3:17-cv-06513-MAS-LHG
FUND, LTD.,)	
Plaintiff,)	
vs.)	
VALEANT PHARMACEUTICALS)	
INTERNATIONAL, INC., et al.,)	
Defendants.)	
PUBLIC EMPLOYEES' RETIREMENT)	No. 3:17-cv-07625-MAS-LHG
SYSTEM OF MISSISSIPPI,)	
Plaintiff,)	
vs.)	
VALEANT PHARMACEUTICALS)	
INTERNATIONAL, INC., et al.,)	
Defendants.)	

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THE BOEING COMPANY EMPLOYEE) No. 3:17-cv-07636-MAS-LHG
RETIREMENT PLANS MASTER)
TRUST and THE BOEING COMPANY)
EMPLOYEE SAVINGS PLANS)
MASTER TRUST,)

Plaintiffs,)

vs.)

VALEANT PHARMACEUTICALS)
INTERNATIONAL, INC., et al.,)

Defendants.)

LORD ABBETT INVESTMENT TRUST-) No. 3:17-cv-06365-MAS-LHG
LORD ABBETT SHORT DURATION)
INCOME FUND, et al.,)

Plaintiffs,)

vs.)

VALEANT PHARMACEUTICALS)
INTERNATIONAL, INC., et al.,)

Defendants.)

This Stipulation is entered into by and between all plaintiffs and defendants in the above-captioned cases (collectively, the “Parties”).

WHEREAS, on October 19, 2017, the Court issued an Order to Show Cause directing the Parties to brief whether the Court should stay the above-captioned cases;

WHEREAS, on October 27, 2017, the defendants filed a brief in support of a stay; on November 3, 2017, the plaintiffs filed briefs opposing a stay; and on November 8, 2017, the defendants filed a reply brief in further support of a stay;

WHEREAS, the Parties were to appear for oral argument on November 29, 2017, but on November 28, 2017, the Parties reached an agreement to resolve the dispute by way of the partial stay detailed below.

NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED by the Parties, subject to the Court’s approval, that:

1. All proceedings and discovery in the above-captioned cases shall be stayed until the conclusion of the criminal trial in *United States v. Tanner, et al.*, Case No. 17-cr-61, or by order of the Court, except that (a) the stay does not apply to or affect in any way the briefing and resolution of any motions to dismiss in the above-captioned actions, and (b) Plaintiffs’ First Request for Production of Documents to Defendants Valeant Pharmaceuticals International, Inc. (“Valeant”) and PricewaterhouseCoopers LLP (“PwC”), in the securities class action, *In re*

Valeant Pharmaceuticals International, Inc. Securities Litigation, Case No. 3:15-cv-07658 (MAS) (LHG), shall not be stayed, and defendants Valeant and PwC shall complete production on or before February 1, 2018.

2. A status hearing is set for March 15, 2018 at 1:00p.m., without prejudice to the plaintiffs seeking to lift the stay if circumstances have changed hereafter and without prejudice to the defendants' right to oppose any such request.

3. This Order shall apply to any subsequent related actions filed in the District of New Jersey.

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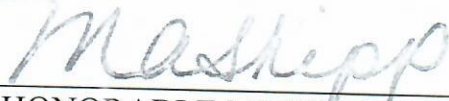
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SO ORDERED, on this 29th day of November, 2017.



THE HONORABLE MICHAEL A. SHIPP
UNITED STATES DISTRICT JUDGE